

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

DON HENDRICKSON,

CASE NO.

Plaintiff,

v.

UNITED OF OMAHA LIFE  
INSURANCE COMPANY,

COMPLAINT

Defendant.

PLAINTIFF STATES:

1. Plaintiff is a resident of Hastings, Adams County, Nebraska.
2. Defendant is a corporation organized under and existing by virtue of the laws of the State of Nebraska and at all times material herein was conducting insurance business in Omaha, Douglas County, Nebraska.
3. At all times material herein Plaintiff was married to Susan Hendrickson, who is now deceased but at all times material herein was a resident of Hastings, Adams County, Nebraska.
4. Prior to her death, Susan Hendrickson purchased a contract of life insurance from United of Omaha Life Insurance Company.
5. Said contract of life insurance was in full force and effect at the time of Susan Hendrickson's death on July 19, 2012.
6. Said contract of life insurance provided for a payment of \$119,000.00 at the time of Susan Hendrickson's death. This payment was to be made to the named beneficiary in the contract of insurance.
7. Said contract of life insurance named the Plaintiff, Don Hendrickson, as the beneficiary.

EXHIBIT A

8. Susan Hendrickson died on July 19, 2012.

9. After Susan Hendrickson's death on July 19, 2012, Don Hendrickson contacted the Defendant regarding the aforementioned contract of insurance and requested that payment be made to him pursuant to the contract of insurance. Defendant refused to make payment.

10. Despite repeated requests for payment, Defendant has continued to refuse to make payment on the contract of life insurance purchased by Susan Hendrickson before her death.

11. Plaintiff has fulfilled every condition precedent pursuant to the contract of insurance before filing this lawsuit, including, but not limited to following the procedural appeal process with Defendant as provided for in the contract of life insurance.

12. Defendant's denial of payment is a breach of the contract of life insurance that Susan Hendrickson had with Defendant on the date of her death.


13. Plaintiff, as a named beneficiary of said contract of insurance has standing to bring this lawsuit.

14. Plaintiff has suffered monetary damages as a result of Defendant's breach of contract.

WHEREFORE, Plaintiff prays for judgment against the Defendant for his damages and such other relief as may be allowed by the State of Nebraska.

Dated this 9 day of June, 2015.

DON HENDRICKSON, Plaintiff,

By: 

Mandy L. Strigenz, #20208  
SIBBERNSEN, STRIGENZ,  
& SIBBERSEN, P.C.  
304 Olson Drive, Suite 211  
Papillion, Nebraska 68046  
(402) 493-7221

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

DON HENDRICKSON,	)	Case No.:
	)	
Plaintiff,	)	
	)	
v.	)	<b>PRAECIPE</b>
	)	
UNITED OF OMAHA LIFE	)	
INSURANCE COMPANY,	)	
	)	
Defendant.	)	

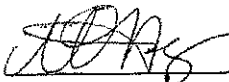
Please issue a Summons for Service by Certified Mail upon the following Defendant:

United of Omaha Life Insurance Company  
c/o Mutual of Omaha Insurance Company,  
General Counsel  
Mutual of Omaha Plaza  
Omaha, Nebraska 68175

Please e-mail said Summons to [mandy@sibbandstrig.com](mailto:mandy@sibbandstrig.com) or  
[Stacey@sibbandstrig.com](mailto:Stacey@sibbandstrig.com)

Dated this 9 day of June, 2015.

DON HENDRICKSON, Plaintiff

BY: 

Mandy L. Strigenz, #20208  
SIBBERNSEN, STRIGENZ  
& SIBBERNSEN, P.C.  
304 Olson Drive, Suite 211  
Papillion, Nebraska 68046  
[mandy@sibbandstrig.com](mailto:mandy@sibbandstrig.com)  
(402) 493-7221  
ATTORNEY FOR PLAINTIFF

Image ID:  
D00325822D01

**SUMMONS**

Doc. No. 325822

IN THE DISTRICT COURT OF Douglas COUNTY, NEBRASKA  
1701 Farnam  
Omaha NE 68183

Don Hendrickson v. United of Omaha Life Ins

Case ID: CI 15 5085

TO: United of Omaha Life Ins  
DBA: c/o Mutual of Omaha Ins.

**FILED BY**  
Clerk of the Douglas District Court  
06/09/2015

You have been sued by the following plaintiff(s):

Don Hendrickson

Plaintiff's Attorney: Mandy L Strigenz  
Address: 304 Olson Drive, Suite 211  
Papillion, NE 68046

Telephone: (402) 493-7221

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Date: JUNE 9, 2015

BY THE COURT:

*John M. Friend*  
Clerk



PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

United of Omaha Life Ins  
Mutual of Omaha Plaza  
Omaha, NE 68175

Method of service: Certified Mail

You are directed to make such service within ten days after the date of issue, and file with the court clerk proof of service within ten days after the signed receipt is received or is available electronically, whichever occurs first.

Filed in Douglas District Court

\*\*\* EFILED \*\*\*

Case Number: D01C1150005085

Transaction ID: 0002501970

Filing Date: 06/23/2015 10:31:42 AM CD

SERVICE RETURN

Doc. No. 325822

IN THE DISTRICT COURT OF DOUGLAS \*  
COUNTY, NEBRASKA  
Douglas County Courthouse  
1701 Farnam Street  
Omaha, Nebraska 68183

To: Don Hendrickson v. United of Omaha Life Insurance Company CI 15-5085  
Case ID:

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

UNITED OF OMAHA LIFE  
INSURANCE COMPANY  
C/O MUTUAL OF OMAHA  
INSURANCE COMPANY  
MUTUAL OF OMAHA PLAZA  
OMAHA, NEBRASKA 68175

## 2. Article Number

(Transfer from service)

7012 0470 0001 1836 8565

PS Form 3811, July 2013

Domestic Return Receipt

(owner or authorized person)

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X *ad*☐ Agent☐ Addressee

## B. Received by (Printed Name)

*HENDRICKSON*

## C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

93 REC'D JUN 15 2015

## 3. Service Type

☒ Certified Mail®☐ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

I hereby certify that on

served copies of the Summons

### CERTIFIED MAIL PROOF OF SERVICE

Copies of the Summons were mailed by certified mail,

TO THE PARTY: United of Omaha Life Insurance Company

At the following address: c/o Mutual of Omaha Insurance Company

Mutual of Omaha Plaza

Omaha, Nebraska 68175

on the 9th day of June, 2015, as required by Nebraska state law.

Postage \$ 9.70

Attorney for:

*Signature*  
Plaintiff

The return receipt for mailing to the party was signed on June 15, 2015.

To: United of Omaha Life Insurance Company  
c/o Mutual of Omaha Insurance Company  
Mutual of Omaha Plaza  
Omaha, Nebraska 68175

From: Mandy L. Strigenz  
Sibbernson, Strigenz & Sibbernson, P.C.  
304 Olson Drive, Suite 211  
Papillion, Nebraska 68046

## ATTACH RETURN RECEIPT & RETURN TO COURT



**Westroads Office Park**  
1111 N. 102nd Court, Suite 330  
Omaha, NE 68114

**Sarpy County Office**  
304 Olson Drive, Suite 211  
Papillion, NE 68046

Office: (402) 493-7221  
Fax: (402) 397-3515

**E. Terry SibbernSEN**  
terry@sibbandstrig.com

**Mandy L. Strigenz**  
mandy@sibbandstrig.com

**Andrew D. SibbernSEN**  
andy@sibbandstrig.com

**Julie D. Pham**  
julie@sibbandstrig.com

June 18, 2015

Sullivan & Sharonda Lewis  
3030 Nicholas Street  
Omaha, Nebraska 68131

RE: Lewis v. Leonard Smith  
Date of Loss: January 16, 2015

Dear Sullivan and Sharonda:

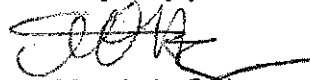
Please call me upon receipt of this letter. I tried to call you but the phone number I have for you (402-415-6171) was disconnected.

The insurance company is offering \$25,000.00 to settle your claim. The State of Nebraska is asserting a subrogation interest for the medical bills they paid and this will be significantly larger than the \$25,000.00. As such, it is important to find Underinsured Motorist Coverage information if possible. Please let me know if you have found that?

I look forward to speaking with you.

Thank you.

Very truly yours,



Mandy L. Strigenz

MLS/slg